

Thiago M. Coelho, SBN 324715  
[thiago@wilshirelawfirm.com](mailto:thiago@wilshirelawfirm.com)  
Binyamin I. Manoucheri, SBN 336468  
[binyamin@wilshirelawfirm.com](mailto:binyamin@wilshirelawfirm.com)

**WILSHIRE LAW FIRM**

3055 Wilshire Blvd., 12<sup>th</sup> Floor  
Los Angeles, California 90010  
Telephone: (213) 381-9988  
Facsimile: (213) 381-9989

*Attorneys for Plaintiff and Proposed Class*

**UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

FLOR JIMENEZ, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

WYNDHAM HOTEL GROUP, LLC d/b/a  
WYNDHAM HOTELS & RESORTS, a  
Delaware limited liability company; and  
DOES 1 to 10, inclusive,

Defendants.

CASE NO.: 2:22-CV-01146-MCE-KJN

Magistrate Judge Morrison C. England, Jr.  
Courtroom 7, 14th floor

**NOTICE OF SETTLEMENT**

Complaint Filed: June 30, 2022  
Trial Date: None

1 Plaintiff, Flor Jimenez (“Plaintiff”) hereby notifies the Court that the claims of Plaintiff  
2 have settled on an individual basis. A notice of dismissal with prejudice of Plaintiff’s individual  
3 claims and without prejudice of the claims of the putative class in accordance with Federal Rule  
4 of Civil Procedure 41(a)(1)(A)(i) will be filed upon execution of a formal settlement agreement.  
5 Plaintiff reserves the right to reopen within forty-five (45) days if a settlement is not finalized.  
6

7 Dated: September 8, 2022

Respectfully Submitted,

8  
9 /s/ Binyamin I. Manoucheri

10 Thiago M. Coelho

Binyamin I. Manoucheri

**WILSHIRE LAW FIRM**

*Attorneys for Plaintiff and*

*Proposed Class*  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 8, 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which sent notification to all counsel of record, who are deemed to have consented to electronic service via the CM/ECF system.

Dated: September 8, 2022

/s/ Binyamin I. Manoucheri

Binyamin I. Manoucheri